



**U.S. Department of Justice**

*United States Attorney  
District of New Jersey*

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May 12, 2020

The Honorable Susan D. Wigenton  
United States District Judge  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: *United States v. William E. Baroni, Jr. and Bridget Anne Kelly*  
Crim. No. 15-193 (SDW)

Dear Judge Wigenton:

This responds to the motions filed by defendants William E. Baroni, Jr. and Bridget Anne Kelly to vacate their convictions, sentences, and bail conditions. The Government consents to the cancelling of bail and the removal of all related restrictions for both Baroni and Kelly. As for their convictions and sentences, at present, jurisdiction has not yet been returned to this Court. Once that procedural bar falls away, the Court can act on the balance of their motions.

Respectfully submitted,  
MARK E. COYNE  
Attorney for the United States\*

By: /s/Lee M. Cortes, Jr.  
Lee M. Cortes, Jr.  
Assistant U.S. Attorney

cc: Stephen Orlofsky, Esq.  
Michael Critchley, Esq.

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\* Acting under authority conferred by 28 U.S.C. § 515.